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*Attorney for Plaintiffs*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

MARLAND JACKSON, MOTHER (Wilma  
Banks),

Plaintiff,

v.

STATE OF NEVADA, DOC, *et al.*,

Defendants.

Case No. 2:23-cv-02015-CDS-BNW

**STIPULATION AND PROPOSED  
ORDER TO EXTEND DISCOVERY  
(FIRST REQUEST)**

Plaintiff, Marland Jackson, Mother (Wilma Banks) (“Plaintiff”), through her attorney, C. Benjamin Scroggins, Esq. of Law Firm of C. Benjamin Scroggins, and Interested Party Nevada Department of Corrections, through their attorneys of record, Aaron D. Ford, Esq., and Jamie S. Hendrickson, Senior Deputy Attorney General, of the Office of the Attorney General, respectfully submit the following Stipulation to extend discovery deadlines (first request.)

**I. MEETING**

- a. C. BENJAMIN SCROGGINS, ESQ. of The Law Firm of C. Benjamin Scroggins, Chtd., representing Plaintiffs’; and
- b. JAMIE S. HENDRICKSON, Senior Deputy Attorney General of The Office of Nevada Attorney General, representing Defendants, State of Nevada ex rel. Nevada Department of Corrections, Antonio Bryant, Ivon Dubon, Calvin Johnson and Gabriel Yanez;

- c. Counsel met and conferred on or about February 7, 2025 concerning the subject request to extend discovery deadlines.

## II. INITIAL DISCLOSURES

- a. Plaintiffs' and Defendants' discovery is ongoing and continuing to supplement.

## III. DISCOVERY PLAN/DEADLINES

- a. The parties previous timeline discussed the 180 days from initial disclosure, however Plaintiff's counsel has since had to initiate a Special Administrator proceeding in the Clark County District Court in order to obtain certain records needed by the defendants and is respectfully seeking a 120-day extension.

- b. Defendants' counsel, Jamie Hendrickson, was recently assigned to take over this case and has agreed to the request of a continuance in order to get fully up to speed on the case and has agreed to the following new deadlines:

	<b>Current Deadline Date</b>	<b>Proposed Deadline Date</b>
Discovery Cut-Off	April 7, 2025	<b>August 5, 2025</b>
Initial Disclosures	October 7, 2024	<del>Closed</del>
Amend Pleadings or Add Parties	January 7, 2025	<b>May 7, 2025</b>
Initial Expert Disclosures	February 6, 2025	<b>June 6, 2025</b>
Rebuttal Expert Disclosures	March 10, 2025	<b>July 8, 2025</b>
Dispositive Motions	May 7, 2025	<b>September 4, 2025</b>
Joint Pre-Trial Order	June 6, 2025	<b>October 6, 2025</b>

## IV. JUSTIFICATION FOR LONGER DISCOVERY PERIOD

This is a wrongful death case with multiple defendants and voluminous records that must be obtained and reviewed. There has been a delay in obtaining some of the crucial records needed in the litigation due to the need to have a Special Administrator appointed. Additionally, the attorney representing the defendants was only recently assigned to the

case. There is also hope that once the parties are able to obtain all necessary documents there will be a possibility of settlement.

## V. OTHER ISSUES

### a. Alternative Dispute Resolution

The parties believe that this case might be appropriate for a mediation or settlement conference. However, there is much discovery to be obtained and reviewed before such efforts would be meaningful.

By entering into this stipulation, none of the parties waive any rights or defenses they have under statute, law, or rule with respect to Plaintiff's complaint.

DATED this 19th day of February, 2025.

DATED this 19th day of February, 2025.

AARON D. FORD

Attorney General

By: /s/ C. Benjamin Scroggins

C. BENJAMIN SCROGGINS (Bar no. 7902

*Attorney for Plaintiff*

By: /s/ Jamie S. Hendrickson

JAMIE S. HENDRICKSON (Bar No. 12770

Senior Deputy Attorney General

*Attorneys for Interested Party*

### ORDER

IT IS SO ORDERED.

  
UNITED STATES MAGISTRATE JUDGE

DATE: February 20, 2025